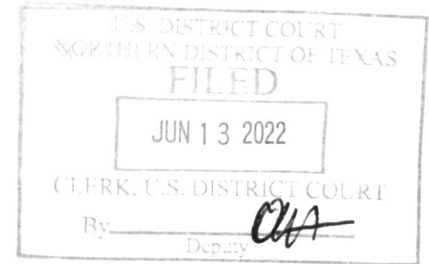


UNITED STATES OF AMERICA
IN THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



<u>LINZI La DAWN SHIFFLETT</u>	\$	
<u>FEDERAL I.D. #: 55189-177</u>		
<u>TDCJ.I.D. #: 02179855</u>	§	FEDERAL CAUSE NO(s):
<u>PETITIONER</u>		<u>3:16 - CR - 00497 - B(1)</u>
<u>V.</u>	§	STATE CAUSE NO(s):
<u>UNITED STATES OF AMERICA</u>		<u>DC - F2016 - 00049</u>
<u>RESPONDENT</u>	§	

MOTION OF PETITIONER FOR MODIFICATION/REDUCTION OF SENTENCE

(Pursuant to 18 USC § 3553)

MOTION REQUESTING SENTENCES BE RAN CONCURRENT
WITH STATE OFFENCES

NOW COMES Linzi La Dawn Shifflett, Petitioner into this Honorable Court appearing in and of her own behalf, as ProSe Litigant and respectfully moves this Honorable Court for an order modifying and thus reducing her sentence of imprisonment, pursuant to USC § 3553; quoting from Jason Pepper V. United States of America.

STATEMENT OF THE CASE

Petitioner was sentenced to 720 months(case filed 12-21-2017) - 60 calendar years., in U.S. Federal Court.

Petitioner was sentenced to 30 years by the State of Texas.

These offences were Possession of Child Porn in both Federal Court and State Court. (Aggravated Sexual Assault of child in state court)

The Petitioner respectfully asks this Honorable Court to consider the amount of time she was sentenced to and to consider these sentences to be ran concurrently. Petitioner also asks this court to consider the post conviction rehabilitation activities that the Petitioner is involved in to make a determination under the 18 USC's § 3553 guidelines; would Petitioner be entitled to a different sentence.

Under sentencing guidelines post offence rehabilitation is one of the ways a petitioner may demonstrate acceptance of responsibility warranting a reduction of Petitioner's time.

the particular sentence to be imposed shall consider the following:

1. Nature & Circumstances of the offence
2. History & Characteristics of the Petitioner
3. Sentence available
4. Punishment range

Petitioner asks this Honorable Judge to re-consider the amount of time she recieved, recently it was made known that The Honorable Judge Jackson that was chosen for the United States Supreme Court had shown compassion for the defendants that were in her court -

Ultimately there is no excuse for the participation played by the Petitioner in her cases; Petitioner is ashamed of her actions which in turn she lost her daughter ~~permanently~~, noting that nothing can change the facts of her actions. Petitioner is seeking grace and mercy from this Honorable Court.

In spite of Petitioner's incarceration Petitioner has made exceptional effort to better herself and has made a genuine effort to do everything possible to to stay focused Petitioner is self-motivated to rehabilitate.

Petitioner is active with many mail-in Bible studies as well as all available chapel and educational classes that are offered at the William P. Hobby unit.

Petitioner has maintained continuous employment during her entire time of being in TDCJ.

Petitioner asks this Honorable Court if she is able to be transferred back to a Federal Holding center to finish her time, being as there is more opportunity for self-improvement.

This supports to the conclusion that imprisonment was not necessary to deter Petitioner from future crimil acts.

Therefore based on the foregoing argument and authorities the Petitioner urges this Court to modify said sentence and enter a new judgement. and any relief in which this Honorable Court deems fair & just.

Submitted on the ____day ____, 2022.

Respectfully Submitted,

LINZI La DAWN SHIFFLETT, Pro Se



